

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

ELIZA REID and TRACY WATERS, on behalf  
of themselves and all others similarly situated,

Plaintiffs,

vs.

GMC SKIN CARE USA INC. d/b/a G.M.  
COLLIN,

Defendant.

Civ. Action No.: 8:15-cv-00277-BKS-CFH

**JOINT MOTION FOR DISMISSAL OF  
PLAINTIFF'S CASE PURSUANT TO FED.  
R. CIV. P. 41(a)(1)(A)**

**TO THE HONORABLE COURT, ALL PARTIES HEREIN AND THEIR  
RESPECTIVE ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Plaintiffs ELIZA REID and TRACY WATERS, on behalf of themselves and all others similarly situated ("Plaintiffs"), through their counsel of record, that pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), this action shall be, and is dismissed WITH PREJUDICE as to all individual claims asserted by Plaintiff against Defendant, and WITHOUT PREJUDICE as to any class claims. Each party shall bear its own fees and costs. Further, the terms of the Settlement Agreement entered into between the parties to this action are hereby incorporated in this Stipulation.

Dated: July 19, 2017

By: /s/ Ronald A. Marron  
Ronald A. Marron

**LAW OFFICES OF RONALD A. MARRON,  
APLC**

Ronald A. Marron (*pro hac vice*)  
[ron@consumersadvocates.com](mailto:ron@consumersadvocates.com)  
651 Arroyo Dr.  
San Diego, California 92103  
Telephone: (619) 696-9006  
Facsimile: (619) 564-6665

Antonio Vozzolo  
*avozzolo@vozzolo.com*  
**VOZZOLO, LLC**  
345 Route 17 South  
Upper Saddle River, New Jersey 07458  
Telephone: (201) 630-8820  
Facsimile: (201) 604-8400  
***Attorneys for Plaintiffs and the  
Putative Class***

By: /s/ Craig M. Nicholas  
**NICHOLAS & TOMASEVIC, LLP**  
Craig M. Nicholas  
Alex M. Tomasevic  
*(pro hac vice pending)*  
225 Broadway, 19<sup>th</sup> Floor  
San Diego, CA 92101  
Telephone: (619) 325-0492  
*cnicholas@nicholaslaw.org*  
*atomasevic@nicholaslaw.org*

Jonathan Chen  
**THE LAW OFFICES OF  
JONATHAN CHEN**  
136-56 39<sup>th</sup> Avenue, Ste. 302B  
Flushing, NY 11354  
Telephone: (212) 983-9330  
*attyjc@gmail.com*  
***Attorneys for Defendant***

IT IS SO ORDERED:



**Brenda K. Sannes**  
**U.S. District Judge**

Dated: July 26, 2017  
Syracuse, NY